

## **WIOA Title I-B Youth Program Q & A**

### **Subject: Educational Functioning Level Type Measurable Skill Gain**

**Date: June 22, 2018**

#### **Question:**

If an individual passed only one portion of the GED test, would that qualify as obtaining an Educational Functioning Level (EFL) for a measurable skill gain for the WIOA Youth Program?

#### **Response:**

No, it does not qualify as obtaining an EFL according to the WIOA Title I-B Measurable Skill Gain Checklist. An individual must obtain passing scores on all four parts of the GED Test and the AZ Civics Test for the individual to obtain a measurable skill gain. The link to the Measurable Skill Gains Checklist is [https://des.az.gov/sites/default/files/media/msgchecklist\\_0.pdf](https://des.az.gov/sites/default/files/media/msgchecklist_0.pdf). When the individual passes all four parts of the GED Test and the AZ Civics Test, the measurable skill gain is be recorded in AJC as the High School Equivalency (HSE) type for Measurable Skill Gain.

### **Subject: Report Card/ Transcript Document for Measurable Skill Gain**

**Date: June 22, 2018**

#### **Question:**

Would proof of completing and passing a GED preparation course qualify as a Measurable Skill Gain (MSG) under the secondary transcript type if the school offering the HSE/ GED course could provide the transcript?

#### **Response:**

Having completed a secondary education program that leading to a GED is not a Measurable Skill Gain. However, a secondary report card/ transcript *would* count as a Measurable Skill Gain if it showed that participant met Arizona's academic standards (The report card/ transcript must show that the participant received a D- or above in all classes.)

### **Subject: Re-Testing for Basic Skills Deficiency**

**Date: February 27, 2018**

#### **Question:**

Are WIOA Title I-B Youth programs required to Re-TABE youth within 12 months, who scored Basic Skills Deficient at time of enrollment?

**Response:**

No, there is no requirement to retest within 12 months. Per PB 17-015 Basic Skill Assessment for the Objective Assessment, LWDAs are not required to use test approved for the National Reporting System, nor determine educational functioning level for the objective assessments. LWDAs are not prohibited from using these tools. LWDAs may use the following methods to measure basic skills for the objective assessment, as described in PB 17-015.

A. Other formalized testing instruments designed to measure skill-related gains. The formal testing must be:

1. Valid and reliable;
2. Appropriate for the target audience;
3. Fair;
4. Cost effective;
5. Well-matched to the test administrator's qualifications; and
6. Easy to administer and interpret results.

B. Less formal alternative assessment techniques such as observation, folder reviews, or interviews may be used for individuals with disabilities who have accessibility issues related to formalized instruments, as described in TEGL 21-16.

C. LWDAs may use previous basic skills assessment results if such previous assessments have been conducted in the past six months.

Per WIOA Title I-B Training services policy section 515.B.2, youth who are attending education below the secondary level are included in the measureable skill gain (MSG) performance indicator. One of the types of MSGs a youth may achieve includes an increase of at least one educational functioning level (EFL) (sec. 515.A.1). One of the methodologies for determining an increase of at least one EFL is to compare the participant's pre-test EFL with a post-test EFL. When using this methodology for the MSG performance indicator, LWDAs are required to test for EFL using a test approved by the National Reporting System. The same test and version must be used for both the pre and post- test. Since at least one MSG is required each year the youth participates in an education and training service, it is recommended that youth in education below the secondary level be post-tested prior to the end of the program year to determine if there is an increase in EFL.

**Subject: Compulsory Age Attendance**

**Date: February 12, 2018**

**Question:**

In 20 CFR § 681.210(c)(2), the second eligibility barrier is “a youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter.” This section of the final rule further states that a “school year calendar quarter is based on how a local school district defines its school year quarters. In cases where schools do not use quarters, local programs must use calendar year quarters.”

However, I do not see any mention of this in either the WIOA Title I-B Youth Program Policy or the WIOA QandA. Please advise if it should be in policy?

**Response:**

A.R.S.15-803 only requires youth to attend school until their 16<sup>th</sup> birthday and the minimum age for the WIOA Title I-B Youth program for out-of-school youth is 16 years old. Since this criteria does not apply in Arizona, it was not included in the state’s WIOA Title I-B Youth Program Policy.

For the definition of out-of-school youth, youth who are no longer attending school must not be required to wait until they have not attended school for at least the most recent complete school calendar quarter or calendar quarter to be enrolled in the WIOA Title I-B Youth program. There is not a waiting period.

**Subject: Family Size**

**Date: January 18, 2018**

**Question:**

In the following scenario, what would you consider the family size to be per policy broadcast #17-02 defines family as two or more persons related by blood, marriage, or decree of court, who are living in a single residence, and who are included in one or more of the following categories:

- a- a married couple and dependent children,
- b- a parent or guardian and dependent children or
- c- a married couple.

Example - Brandy is a younger youth, she has 2 siblings, her parents are not married but live in the same household. The paternal grandparents live in the household.

**Response:**

The family size would be five (Brandy+2 siblings+ mom + dad). In this scenario, the grandparent’s income would not be counted.

**Subject: Education Provided Concurrently with Workforce Preparation Activities**

**Date: November 6, 2017**

**Question:**

For WIOA Youth Element #5, “Education offered concurrently with workforce preparation activities for a specific occupation”, is the “Education offered concurrently” component limited to basic skills education toward a High School Diploma or its Equivalent?

Or, can the “Education offered concurrently” component be post-secondary education related to a specific occupation in a program for youth who already have a High School Diploma or its Equivalent?

**Response:**

No, if the participant is in postsecondary education the “Education offered concurrently with workforce preparation activities” is not used. The Occupational Skills Training service code must be added to the S & T plan in AJC, along with the additional services provided.

Education offered concurrently with workforce preparation activities for a specific occupation is an integrated training model and includes:

1. Workforce preparation activities;
2. Basic academic skills; and
3. Hands-on occupational skills that are offered during the same time frame, and connected to training in a specific career pathway, occupational cluster, or career pathway.

The participant must receive instruction in basic academic skills, which is provided by Title II, as well as the other two components in order for LWDAs to provide this service.

If the participant is receiving postsecondary education.

**Subject: Required Documentation for English Language Learner**

**Date: August 9, 2017**

**Question:**

We are seeking guidance on the documentation required to enroll a Youth Program participant with the English Language Learner (ELL) barrier.

The WIOA regulations identify ELL as:

*English language learner, when used with respect to a participant, means an eligible individual who has limited ability in reading, writing, speaking, or comprehending the English language, **and**:*

- (1) Whose native language is a language other than English; or*
- (2) Who lives in a family or community environment where a language other than English is the dominant language.*

The DES WIOA Title 1B Eligibility Checklist identifies “AJC Case Notes” as an acceptable form of verification for the ELL eligibility item.

Based on the above, is it ever possible for an ELL customer to score above the Basic Skills Deficiency levels in TABE Reading, Writing, Language? For example, if a customer scores at a 10.0+ grade level on their TABE Reading and Language scores, can they be enrolled as ELL through an attestation (and case note) of a limited ability in comprehending English and a native language other than English?

**Response:**

Yes, it is possible. The participant may still have limited ability in reading, writing, speaking or comprehension of the English language. Yes, case notes may be used to document that the individual is an English Language Learner.

**Subject: Tests Approved by the National Reporting System**

**Date: August 8, 2017**

**Question:**

Is the Wonderlic General Assessment of Instructional Needs (GAIN) is an acceptable assessment by WIOA to determine Basic Skills for WIOA Youth Enrollment and Eligibility purposes?

**Response:**

Yes, if your Local Workforce Development Area (LWDA) is using the forms/ tests below they may be used for both the Objective Assessment and for determining documented achievement of at least one educational functioning level by a participant below the postsecondary education level for the Measurable Skill Gain Performance Accountability Measure.

For the Objective Assessment LWDAS are not required to use a test approved by the National Reporting System (NRS). Although LWDAs are not prohibited using these tools.

Other formalized testing instruments may be used, and must be: valid and reliable, appropriate for the target audience, fair, cost effective, well-matched to the test

administrator's qualifications; and easy to administer and interpret results. See PB #17-015 Basic Skill Assessment for the Objective Assessment  
<https://des.az.gov/sites/default/files/media/pb17015basicskillstestingfortheobjectiveassessment.pdf>

For the Measurable Skill Gain Performance Accountability Measure, to determine documented achievement of at least one educational functioning level by a participant below the postsecondary education level a test approved by the NPS must be used. See Revised PB #17-016 Measurable Skill Gain Documentation Requirements.

Here is the link:

[https://des.az.gov/sites/default/files/media/ib17\\_016revisedmeasurable\\_skill\\_gain\\_documentation\\_requirements.pdf](https://des.az.gov/sites/default/files/media/ib17_016revisedmeasurable_skill_gain_documentation_requirements.pdf). The following Wonderlic tests are on the list of approved tests for ABE and ASE and are approved through February 2, 2019. Here is the link to the list of approved test for the National Reporting System (NRS):<https://www.gpo.gov/fdsys/pkg/FR-2016-12-13/pdf/2016-29899.pdf>.

1. General Assessment of Instructional Needs (GAIN)-Test of English Skill. Forms A and B are approved for use on paper and computer-based delivery format.
2. General Assessment of Instructional Needs (GAIN)—Test of Math Skills. Forms A and B are approved for use on paper and computer-based delivery format.

**Subject: Educational Functional Level**

**Date: July 31, 2017**

**Question:**

Can you please clarify that by doing a pre/post test utilizing the TABE 9/10 assessment, if a customer raises their score by a grade level (i.e. 6.3 to 7.5) that would count as an EFL gain for MSG?

**Response:**

Yes, as described in Policy Broadcast #17-016 *Measurable Skill Gain Documentation Requirements*, if the participant is receiving instruction below the postsecondary level, an increase in Educational Functioning Level (EFL) would count as a Measurable Skill Gain as long as the pre-and post-test is the same test and version using any one of the most recent list of tests determined suitable for the National Reporting System, which includes TABE 9/10.

**Subject: Development of the Individual Service Strategy (ISS)**

**Date:** July 12, 2017

**Question:**

Is it acceptable under WIOA to develop, sign and date the ISS with youth during their Initial Intake and Eligibility Determination meeting, before their WIOA Title I-B Enrollment is approved in AJC? Or is this considered an Individualized Service that should only occur after the youth is enrolled?

**Response:**

For the WIOA Title I-B Youth Program, the development of the Individual Service Strategy (ISS) is considered a component of the design framework. Youth Funds may be expended on outreach and recruitment, and on assessment of basic skills prior to an eligibility determination, but cannot be spent on youth program services, such as the 14 youth elements. The youth may date the ISS using the date of the Initial Intake and Eligibility Determination meeting. Any updates to the ISS must be initialed by the participant and the case manager and include the date the update to the ISS was made. The details of the meeting with the participant and updates to the ISS must be included in the case notes in AJC. If the update occurs over the phone, case notes must include information on the update to the ISS and details of the telephone conversation, including the date and time the conversation occurred.

The youth must be registered in AJC. Participation for the youth program includes:

- 1) The collection of documentation to support an eligibility determination;
- 2) The provision of an objective assessment;
- 3) Development of an ISS; and
- 4) Participation in any of the 14 WIOA Title I-B Youth program elements.

In AJC, the eligibility determination, objective assessment, and ISS must be added as a service on the S&T Plan page prior to adding the program element. The Estimated Start

Date and Actual Start Date for the program element can be on or after the date of the last design framework service (eligibility determination, objective assessment, and ISS).

**Subject: High School Equivalency Exam**

**Date:** June 20, 2017

**Question:**

If a participant studying for their GED passes a portion of the GED test, but not all portions, can we include this as a measurable skills gain?

**Response:**

No, the participant would need to attain his/her High School Equivalency Diploma. For the participant to attain his/her High School Equivalency Diploma, the participant must pass all four sub-tests of the GED Exam, and in Arizona, the Arizona Civics Test.

**Subject: Non-WIOA Title I-B Paid Training**

**Date:** June 20, 2017

**Question:**

We understand the training program must be listed on the ETPL as WIOA approved for WIOA Title I-B to provide tuition assistance through an OTA. However, many youth has pay for training in their area of interest, complete training and obtain a credential on their own. In this case, we do not get to count the credential for attainment/obtained credential if the credential is not from a program that is an ETPL WIOA approved training program. Is there a way we can get credit?

**Response:**

A WIOA Title I-B Training Policy revision is in progress and will include instructions on how to enter a credential that was earned by a participant during participation, or within one year after exit from the WIOA Title I-B program, in AJC. It does not matter if the participant paid for the training on his or her own or if a partner program with whom the participant is co-enrolled paid for training. WIOA Title I-B programs may take credit for a credential, as long as it meets the definition of a recognized credential on page 12 of Training and Employment Guidance Letter (TEGL) 10-16: *Performance Accountability*



*Guidance for Workforce Innovation and Opportunity Act (WIOA) Title I, Title II, Title III and Title IV Core Programs.* A participant must have earned a recognized credential during participation, or within one year after exit from the program, and was also employed, or in an education or training program leading to a recognized postsecondary credential within one year after exit. It is the Local Workforce Development Area's (LWDA's) responsibility to verify that attainment meets the definition of a federally recognized postsecondary credential.

**Subject: High School Equivalency, GED Programs, and School Status**

**Date:** June 20, 2017

**Question:**

If Youth attending HSE or GED programs are not considered In-School Youth (ISY) by the school system, is it accurate that the youth in the HSE or GED should be considered Out-of-School Youth (OSY) by the WIOA Title I-B Program?

**Response:**

Per 20 CFR 681.230, Youth attending High School Equivalency (HSE) programs, including GED programs, and Dropout Re-engagement programs are not considered ISY. Participants who participate in these programs would be considered OSY. An exception exists for youth attending a high school equivalency program, funded by the K-12 school system, who are classified as still enrolled.

If the participant is participating in a high school equivalency program that is funded by the K-12 system and the youth service provider has verified with the K-12 school system that the participant is not classified as still enrolled, the youth service provider may enroll the participant as an OSY.

**Subject: Dropout Recovery Programs and School Status**

**Date:** June 20, 2017

**Question:**

Are youth in Dropout Recovery programs consider In-School Youth (ISY) or Out-of-School Youth (OSY)?

**Response:**

Dropout Recovery Programs are not considered school, as described at 20 CFR 681.230,. Participants of Dropout Recovery Programs are considered to have already dropped out of school and would therefore be considered OSY.

**Subject: Fees for TABE Testing**

**Date:** June 20, 2017

**Question:**

We have to TABE test as part of eligibility. This testing must be done on computer and there is a fee incurred. How can we recoup this fee? What if the youth does not enter the program after testing?

**Response:**

An objective assessment is one of the costs that may be paid for prior to enrollment, per Training and Employment Guidance Letter (TEGL) 21-16: *Third Workforce Innovation and Opportunity Act (WIOA) Title I Youth Formula Program Guidance*. Per Policy Broadcast 17-015, *Basic Skill Assessment for the Objective Assessment*, youth service providers no longer need to use a test approved by the National Reporting System (NRS) for the objective assessment. The youth service provider is also no longer required to determine a participant's Educational Functioning Level (EFL) as part of the objective assessment.

Youth must register in AJC, and staff must enter case notes in AJC detailing that the youth received an objective assessment, in order for the youth service provider to be reimbursed for the cost of the objective assessment. Youth do not need to be determined eligible or enrolled in the WIOA Title I-B program for the youth service provider to be reimbursed for the objective assessment. The youth service provider must submit an invoice to the LWDA for reimbursement of the cost of the objective assessment. Youth service providers must refer to contracts with the LWDA's and to local policies regarding reimbursements.

**Subject: Assessments Costs**

**Date:** June 20, 2017

**Question:**

If we utilize other assessments that incur cost, how can we recoup those fees? What is the maximum amount that can be spent on assessments?

**Response:**

An objective assessment is one of the costs that may be paid for prior to enrollment, per Training and Employment Guidance Letter (TEGL) 21-16: *Third Workforce Innovation and Opportunity Act (WIOA) Title I Youth Formula Program Guidance*. Youth must register in AJC and staff must enter case notes in AJC detailing that the youth received an objective assessment in order for the youth service provider to be reimbursed for the cost of the objective assessment. Youth do not need to be determined eligible or enrolled in the WIOA Title I-B program for the youth service provider to be reimbursed for the objective assessment. The youth service provider must submit an invoice to the LWDA for reimbursement of the cost of the objective assessment. Youth service providers must refer to contracts with the LWDA and to local policies regarding reimbursements. The state does not have a maximum amount of funds that can be spent on the objective assessment.

**Subject: Paying for Academic and Occupational Components of Work Experience**

**Date:** June 20, 2017

**Question:**

If we are linking a college credit course to the work experience (WEX) as the educational and academic component, how can we pay for the college credit course? How do we pay for training if ISY cannot use ITAs to attend training on the ETPL? The WIOA Title I-B Adult Program will not list the training on the ETPL or pay for the training since it does not lead to a credential?

**Response:**

Contracts are the mechanism to deliver a WEX for both ISY and OSY. Since the academic and occupational component is not provided directly by the employer, an additional contract with the training provider is required.

**Summary: Paying for Work Experience and the ETPL**

**Date:** June 20, 2017

**Question:**

If the training is not part of an ETPL as a WIOA- Approved program, we cannot pay the tuition with an Individual Training Account (ITA)—how can it be funded?

**Response:**

A WEX is not considered training, and therefore the use of the ETPL is not required for a WEX. LWDAs must develop a contract to deliver a WEX for both ISY and OSY. If the academic and occupational component is not included in the contract with the employer, then an additional contract is required to provide the component.

OSY may use ITAs to attend programs on the ETPL; however, the OSY must be enrolled in the Occupational Skills Training Youth Element.

**Summary: Entrepreneurial Training**

**Date:** June 20, 2017

**Question:**

There is only one ETPL WIOA Approved Entrepreneur program at South Mountain Community College and it is a 2-year program to credential. How may we provide training?

**Response:**

If the youth service provider is unable to provide Entrepreneurial Training, the youth service provider must subcontract this youth element to a training provider in the community that is experienced in providing such. If the Entrepreneurial Training is available in the community from a partner program, an MOU with the partner program providing the entrepreneurial training must be in place so that the program element can be offered.

**Summary: Program Exits- 90 Days without Services**

**Date:** June 20, 2017

**Question:**

Is there a way to keep a youth from exiting that are still engaging with us? It takes a LONG time for some of the youth to engage and persuade to try again. \*\*90 days is just not enough time for many of the opportunity youth to fully engage and be stable enough to move forward.

**Response:**

If a gap in service does not apply, and the participant has not received a service funded by the WIOA Title I-B Youth program or a partner program for 90 consecutive calendar days and is not scheduled for future services, the participant is considered to have exited. This is a U.S. Department of Labor requirement. This does not mean that the youth service provider can no longer provide services to the participant; it means that eligibility is required to be re-determined. If it is determined that participant is still eligible, the participant can be re-enrolled in the WIOA Title I-B Youth Program. There is not a waiting period for the youth to be re-enrolled.

**Summary: Non-WIOA Services Provided by the Youth Service Provider**

**Date:** June 20, 2017

**Question:**

Would any service we provide that is NON WIOA count to prevent the exit? For example: Providing food or clothing, taking them to WIC, etc.

**Response:**

Per 20 CFR 677.150, youth who have not received a service funded by WIOA Title I-B Youth Program or a partner service for 90 consecutive calendar days, and who have not scheduled for a future service, are considered to have exited the program. If a service provided to youth were a type of service that extends exit and is provided through a WIOA partner program, the exit date would be extended as long as the service is entered into AJC.

In order to provide a thorough response to this question, identification of programs that are providing services to youth is needed to determine if the program is considered a WIOA partner program.

**Summary: Phone Contact with the Participant**

**Date:** June 20, 2017

**Question:**

If we review the Individual Service Strategy (ISS) goals and remind the youth why they enrolled in the WIOA Title I-B Youth Program in first place over the phone, does this count as a service since the ISS in AJC is representative of all of the services provided?

**Response:**

No, this type of service is considered case management, which is one of the services that does not extend the exit date.

**Subject: GED Exam in Spanish**

**Date:** June 6, 2017

**Question:**

Can you advise if the LWDA may pay for the GED exam in Spanish as a supportive service?

**Response:**

Yes, The High School Equivalency Exam (GED exam) is available in Spanish. However, the Arizona Civics portion of the exam must be taken in English. Per Section 302 of WIOA Title I-B Supportive Services Policy, LWDA's may pay for Educational Testing as a supportive service. This includes paying for the cost of the High School Equivalency Exam.

**Subject:** Definition of "Dependent Child"

**Date:** May 22, 2017

**Question:**

How is "dependent child" defined for the definition of Family?

**Response:**

For the definition of "family", a dependent child is defined as child:

- Under the age of 19 at the end of the previous calendar year; or
- Under the age of 24 at the end of the previous calendar year and was a student.

Note: The individual was a student if he or she was enrolled as a full-time student during the any 5 months of the previous calendar year. The course must have been provided by a school, or state, county or local government. A school includes technical and mechanical schools. It does not include on-the-job training.

Also regardless, of residence and/ or citizenship, anyone claimed as a dependent on another person's federal income tax return for the previous year must be presumed part of the person's family for the current year. To negate this assumption, the person who was claimed as a dependent for income tax purposes is required to provide information that demonstrates the person is no longer financially dependent.

In applying the definition of "family", runaway youth, emancipated youth, and court adjudicated youth separated from family through an involuntary temporary residence elsewhere (e.g. institutionalized, incarcerated, placed as a result of court order) must not be classified as dependent children.

**Subject:** Definition of Family

**Date:** May 3, 2017

**Question:**

Based on the Policy Broadcast # 17-012 Definition of Family, three categories of family are defined, however on WIA Guidance Letter #05-07 a fourth category defined a person who supported themselves at least 50% is considered a family of 1. Does PB #17-012 impact category four on WIA Guidance Letter #05-07?

**Response:**

Yes, it is impacted as this category is not supported in the WIOA definition of "Family". To be considered family for WIOA, the members of the household need to meet the WIOA criteria for such. All WIA Guidance letters have been rescinded and Local Workforce Development Area (LWDA) policy must be updated to include the WIOA definition of family.

Current WIOA Title I-B documents are posted online at:

<https://des.az.gov/services/employment/workforce-development-act/policy-and-procedure-manual>.

**Subject: Documentation of School Status at Exit**

**Date:** April 20, 2017

**Question:**

May a college printout of a student schedule be used as documentation for school status at exit?

**Response:**

Yes, college printout of a student schedule may be used as documentation for school status at exit. The dates of the student schedule must correspond to the participant's exit date for the program.

**Subject: Documentation of School Status in 2<sup>nd</sup> and 4<sup>th</sup> Quarter After Exit**

**Date:** April 20, 2017

**Question:**

May a college printout of a student schedule be used to document in the 2<sup>nd</sup> and 4<sup>th</sup> Quarter after exit?

**Response:**

Yes, the student schedule may be used to document that the participant is enrolled in a training or educational activity for Employment in the 2<sup>nd</sup> and 4<sup>th</sup> Quarter after Exit Performance Accountability Measure for youth. The LWDA must verify that the dates on the student schedule fall in the 2<sup>nd</sup> or 4<sup>th</sup> quarter after exit. This must be entered on the outcomes screen for the 2<sup>nd</sup> and 4<sup>th</sup> Quarter after exit.

**Subject: Partner Provider Services**

**Date:** April 20, 2017

**Question:**

Since Title II Adult Education is a mandated partner in WIOA, can the local area use Support Services to pay for Registration Fees for enrolled youth participants to attend



GED classes at those institutions, such as Rio Salado, even if the institution did *not* respond to an RFP or sign a contract with the local area to deliver ABE or GED training? The fee to be paid is a registration fee, and is on a sliding scale based on income and ranges from \$25-\$70. The fee is not tuition.

**Response:**

Yes, per 681.470 Local Workforce Development Areas (LWDAs) may leverage partner resources to provide some of the readily available program elements. However, the LWDA must ensure that if a program element is not funded with WIOA Title I-B Youth Program funds, the local program has an agreement in place with a partner organization to ensure that the program element will be offered. The Local Workforce Development Board (LWDB) must ensure that the program element is closely connected and coordinated with the WIOA Youth Program. The agreement between the WIOA Title I-B program and the Local Title II funded Adult Education program would be made at the local level, as part of MOU negotiations. Such agreements must also include capacity limitations for the Adult Education program and the referral process. The LWDA may use supportive services funds to cover the supplemental fees for the Adult Education classes.

**Subject: Follow-Up Requirement for Incarcerated Youth**

**Date:** April 13, 2017

**Question:**

As it pertains to Youth Follow-Up, each youth is required to be placed in a year follow-up, however youth who are incarcerated or institutionalized would not be able to actively receive follow-up services. Are these youth able to be excluded and how should they be handled?

**Response:**

If a youth is incarcerated for a period of 90 calendar days or more, follow-up services are not required because the participant is unavailable and he/she will not be included in the performance accountability measures. Case notes must include the reason for exit, and that follow-up services were not provided as required because the youth was unavailable due to incarceration. Documentation must be uploaded into Arizona Job Connection (AJC) or kept in the participant's program file.

**Subject: High-Risk Out-of-School Youth and the WIOA Applicant Statement**

**Date:** January 5, 2017

**Question:**

The Applicant Statement has an option for “Youth Needing Assistance” and the instruction states it can be used as a last resort (page 2). However, the WIOA Title I-B Youth Program policy, Section 200 states, “The WIOA Applicant statement may not be used for upfront enrollment for youth that meet the eligibility criteria”. Can you please clarify?

**Response:**

The LWDA may accept the *WIOA Applicant Statement* (WIA-1027) to allow the upfront enrollment of high-risk Out-of-School Youth (OSY), as described in the [WIOA Title I-B Youth Program](#) policy, Section 213.01 (C) (1-4). The purpose of this policy is to expedite service delivery to high-risk OSY. For data validation purposes, the LWDA may request the documentation from the youth after the youth has begun to receive youth services. Youth who qualify for the WIOA Title I-B Youth Program under the “requires additional assistance to enter or complete an education program or to secure and hold employment, as defined by the LWDA” are not considered high-risk OSY, therefore the *WIOA Applicant Statement* must not be collected upfront for individuals who qualify using this barrier, and must only be used as a last resort. All other barriers included the WIOA definition of OSY in Section 212.01 are to be considered high-risk barriers.

**Subject: Education Offered Concurrently with, and in the Same Context as, Workforce Preparation Activities and Training**

**Date:** December 27, 2016

**Question:**

Does the WIOA Youth Element #5, Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster, require the participant to be receiving formal training in both:

- Academics to earn a High School Equivalency diploma; and

- Occupational training to receive an industry recognized occupational skills credential?”

**Response:**

Yes. Education offered concurrently with, and in the same context as, workforce preparation activities and training for a specific occupation or occupational cluster reflects an integrated education program, as described in 20 CFR 681.630. The integrated education program includes workforce preparation activities, basic academic skills, and hands-on occupational skills training that is taught within the same time frame and connected to training in a specific occupation, occupational cluster, or career pathway. LWDAs must give priority consideration to training programs that result in a recognized postsecondary credential that aligns with in-demand occupations in the local area.

**Subject: Definition of Homeless Individual/Child/Youth**

**Date:** July 26, 2016

**Question:**

Under the Low Income section of AJC questions, ‘Homeless Individual or Child/Youth’, why is the word Child included?

**Response:**

The word “child” was added in AJC to meet the definitions of homeless in the WIOA Final Regulations. The addition of the word “child” does not change the age requirements for Out-of-School Youth (OSY) and In-School Youth (ISY) in the WIOA Title I-B Youth Program.

In the definition of OSY in 20 CFR 681.210, the “homeless” criteria is defined as an individual, age 16 to 24, who meets the criteria in Section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C 14043e-2(6)), and a homeless child or youth, age 16 to 24, who meets the criteria defined in Section 725 (2) of the McKinney-Vento Homeless Assistance Act. In the definition of ISY in 20 CFR 681.220, “homeless” is defined as an individual age 14 to 21 who meets the criteria in section 41403 (6) or the Violence Against Women Act of 1994 (42 U.S.C 14043e-2(6)), a homeless child or youth age 14 to 21 who meets the criteria defined in sec. 725 (2) of the McKinney-Vento Homeless Assistance Act.

**Subject: Re-determining Eligibility**

**Date:** July 2, 2016

**Question:**

“Staff approved an application for a youth applicant on 5/10/16. When the file was sent to the service provider, staff lost contact with the individual. The individual was never enrolled in any services or activities. The individual only completed the eligibility/registration process and his application was approved. Now, the individual is returning and asking for services. The approved application is 53 days old. Can we submit a request to the helpdesk to change the enrollment date or to request to delete the file and start over? Does the application need to be re-determined for eligibility?”

**Response:**

The LWDA will need to re-determine the youth’s eligibility since 30 days have passed, as described in the [WIOA Title I-B Youth Program policy](#), Section 213 (E). This includes collecting new/updated verification documentation for an eligibility determination. The Demographic Snapshot will also need to be updated in AJC. Since the application was reviewed by staff, the Initial Assessment service needs to be added to the Youth Service & Training screen in AJC.

After completing the eligibility determination, send a request to [EA-WIOA@azdes.gov](mailto:EA-WIOA@azdes.gov) to have the enrollment date changed.

**Subject: Signature on the WIOA Applicant Statement**

**Date:** June 9, 2016

**Question:**

We have a young lady age 17 that has applied for our In-School Youth (ISY) program. She is a ward of the State and in the custody of the Department of Child Safety. She is presently living with her aunt in Nogales, but the aunt, of course is not her legal guardian. Can you provide information on how this situation would be handled?

**Response:**

The LWDA must ensure that the *WIOA Applicant Statement* (WIA-1027) is signed by the youth's parent, guardian, or a responsible adult/corroborating witness for a youth younger than 18 years old. By signing the form, the youth's parent, guardian, or a responsible adult/corroborating witness gives permission for the youth to participate in the program and verifies the information on the form is accurate. The form must not be signed by LWDA staff.

In this situation, the client's aunt or another responsible adult/corroborating witness, who is aware of the youth's living situation, may sign the form.

**Subject: Regular Breaks from School and Youth Eligibility**

**Date:** June 9, 2016

**Question:**

Would a youth who just graduated from high school last month and is already registered to begin classes in the fall at Arizona Western College (Post-Secondary Education) be considered an In-School Youth (ISY) or an Out-of-School Youth (OSY)?

**Response:**

In this situation, the youth would be considered an In-School Youth (ISY) because he/she has attended school during the most recent school calendar quarter and has enrolled in classes for the subsequent calendar quarter. The youth would be considered to be on summer break.

Youth who are temporarily not attending school because the school is on break (winter, spring, or summer break), but who intend to return to school after the break are considered to be ISY, even if the youth plans on attending a different school after the break.

**Subject: Documentation Requirements for WIOA Title I-B Youth Program**

**Date:** April 28, 2016

**Question:**

When a Youth participant is determined to be eligible based on more than one criteria, is documentation necessary for each criteria? For example: Participant is 17 years-old,

not attending school, and is a school dropout. He is an individual with a disability and involved with the justice system. Based on his age, school status, and being a school dropout, he is eligible as an Out-of-School youth. However, if he identifies the other characteristics in his AJC enrollment, must documentation be provided?

**Response:**

A youth only needs to meet one of the criteria listed in the [WIOA Title I-B Youth Program policy](#), Section 212.01 and 212.02 to be eligible for the Youth Program. However, the LWDA must collect documentation verifying each criteria that is selected in AJC for data validation purposes. The LWDA only needs to collect one of the documents from the list of acceptable documentation on the [WIOA Title I-B Eligibility Checklist](#) (Exhibit 100A) for each criteria selected in AJC. LWDA's must not require that participants provide more than one type of documentation to verify each criteria.

**Subject: Forms That Require Client Signatures**

**Date:** April 28, 2016

**Question:**

For youth who are under the age of 18 and enrolling in the WIOA Title I-B Youth Program, a parent/guardian or corroborating witness/responsible adult must sign the Applicant Statement form. Are they required to have this additional signature on the WIOA Application, Individual Service Strategy, or any other forms?

**Response:**

WIOA Title I-B Adult & Dislocated Worker and Youth policies only require the *WIOA Applicant Statement* (WIA-1027A) to be signed by the applicant. For youth under 18 years old, the form must be signed by a parent/guardian or a responsible adult/corroborating witness. LWDA policies may require signatures on other documents.

**Subject: Zero Benefit Approval for Nutritional Assistance**

**Date:** September 24, 2015

**Question:**

What does it mean when an individual is approved for nutritional assistance but receives \$0.00 benefit per month? DES approved a participant for services because she was still in need of free and reduced lunch.

**Response:**

An individual who receives, or is eligible to receive, a free or reduced lunch under the National School Lunch Program (NSLP) is considered a low income individual, as described at 20 CFR 681.270. An individual would be considered eligible for NSLP because they qualify for Nutritional Assistance.

NSLP Program eligibility requirements include that:

- Students may be offered reduced-price or free meals, if a parent:
  - Is eligible for Unemployment Insurance Benefits; or
  - Earns at or below current NSLP Income Eligibility Guidelines.
- The child automatically qualifies for free meals at school, if the parent:
  - Receives Supplemental Nutrition Assistance Program (SNAP) benefits; or
  - Receives Temporary Assistance for Needy Families (TANF) Cash Assistance benefits.

Acceptable documentation, as described in the [WIOA Title I-B Eligibility Checklist](#) (Exhibit 100A) includes:

- School documentation on free lunch;
- A SNAP letter that documents nutritional assistance approval; or
- A TANF letter that documents approval.